

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUAN JOHNSON,

Plaintiff,

v.

REYNALDO GUEVARA, and the CITY
OF CHICAGO,

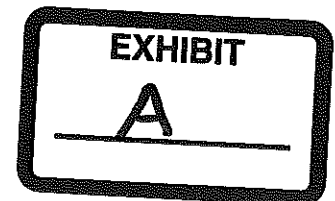
Defendants.

NO. 05 C 1042

JUDGE GRADY

MAGISTRATE JUDGE MASON

**DEFENDANT REYNALDO GUEVARA'S ANSWER TO
PLAINTIFF'S FIRST INTERROGATORIES**



Defendant, Reynaldo Guevara, being first duly sworn under oath makes the following answers to plaintiff's first set of interrogatories:

1. State the name, address and phone number of every person who participated in answering these Interrogatories and accompanying discovery requests, indicating which particular requests were answered by which person.

ANSWER: Object to providing personal information. Without waiving the objection, attorney Arlene E. Martin; defendant Reynaldo Guevara, c/o attorney Martin, 30 No. LaSalle St., Suite 1400, Chicago, Illinois 60602, 312.744.6949.

2. As to Defendant Guevara, state your current address, date of birth, driver's license number and issuing state, and social security number.

ANSWER: Object to providing personal information. Irrelevant and will not lead to admissible evidence. Further, this interrogatory is intended to harass defendant.

3. State and identify the name, address, and telephone number of each individual likely to have discoverable information that you may use to support your defense(s), specifically

ANSWER: Objection. Overly broad, unduly burdensome, vague and confusing; irrelevant. This interrogatory is not meant to lead to relevant admissible evidence. Without waiving the objection, defendant believes he has had more than one complaint register file opened as a result of a civilian making a complaint against him, however, he does not remember the particulars of any complaint register. Further answering and without waiving the objection, no known finding of sustained, nor did he receive any disciplinary action as a result of any civilian complaint. The only other known complaint was a complaint made against defendant for driving with an expired license plate. Defendant does not recall what discipline, if any, was given to him.

10. Please identify any and all criminal convictions of any person relating to this lawsuit that either Defendants will seek to use at trial for purposes of impeaching any witness, or for any other purpose. For each such responsive conviction, identify: (a) the witness who has been convicted and the nature of the conviction; and (b) the complete factual basis as to why the conviction qualifies as admissible under FRE 609. Please be advised that your duty to supplement your answer to this Interrogatory remains ongoing as discovery progresses, and that plaintiff intends to move *in limine* to bar any references to convictions not identified in the manner requested.

ANSWER: Investigation continues. If and when a witness's relevant and applicable criminal history is determined, such information will be tendered to plaintiff.

11. State whether any City of Chicago Police employee or agent ever communicated with any person in the State's Attorney's Office or other law enforcement agency in relation to any of the events described in plaintiff's complaint. For each such Communication state: (a) the date of the Communication; (b) with whom the Communication occurred; and (c) a summary of the nature of the Communication, including any statements made by the City of Chicago Police Department employees and agents, and/or the person with the State's Attorney's Office or other law enforcement agency. If you intend to answer by reference to documents, please state under oath that the documents contain all of the information responsive to this Interrogatory, and provide the relevant Bates Numbers.

ANSWER: Yes. This was a criminal investigation. I am unaware of each and every